



*United States Attorney  
Eastern District of New York*

NMA:RN:AL:sw  
F.#2010R00195  
Disc. 34

*271 Cadman Plaza East  
Brooklyn, New York 11201*

January 18, 2012

**Via ECF**

All Defense Counsel

Re: United States v. Theodore Persico, Jr., et al.,  
Criminal Docket No. 10-147 (S-3) (SLT)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following supplemental discovery with respect to the above-captioned case. This additional discovery was previously provided to the defendant Francis Guerra on December 9, 2011, and December 15, 2011. (Docket Entries Nos. 362 & 364.) The government hereby reiterates its request for reciprocal discovery.

The following documents are available at First Choice Copy. You may obtain a copy of these documents by contacting Joe Meisner at (718) 381-1480 x212, or [jmeisner@nyc.rr.com](mailto:jmeisner@nyc.rr.com). Please reference print order number **60085**.

<b>DX #</b>	<b>DESCRIPTION</b>	<b>BATES RANGE</b>
RX	Rite Aid Pharmacy records for Francis Guerra	1-2
RX	Dyker Heights Pharmacy records for Francis Guerra	3
RX	Fred Notarnicola, M.D. records for Francis Guerra	4-20
RX	Gary Starkman, M.D. records for Francis Guerra	21-104
RX	Harolds Pharmacy records for Francis Guerra	105-108
RX	Isaac Kreizman, M.D. records for Francis Guerra	109-137
RX	James Liguori, M.D. records for Ambrogio Fabbro	138-170

<b>DX #</b>	<b>DESCRIPTION</b>	<b>BATES RANGE</b>
RX	James Liguori, M.D. records for Francis Guerra	171-247
RX	James Liguori, M.D. records for John Fabbro	248-384
RX	James Liguori, M.D. records for Salvatore Fabbro	385-498
RX	Oxford United Health Care records for Angela McDonald-Guerra	499-500
RX	Pollina Pharmacy records for Francis Guerra	501-503
RX	Westside Pharmacy records for Francis Guerra	504-505
RX	Two compact discs containing United Health Group records for Francis Guerra (password to access files is UHG2011)	506-507
RX	A compact disc containing Medco Health Services, Inc. records for Francis Guerra (password to access files is guerra121211)	508

Please contact me if you have any questions or additional requests.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney

By:                     /s/                      
Samantha Ward  
Paralegal Specialist  
(718) 254-6142

cc: Clerk of the Court (SLT) (by ECF)